



4.4 Utilities and Service Systems

This section analyzes the effects of the proposed project on utilities and service systems. It considers potential impacts with respect to water supply and infrastructure, wastewater conveyance and treatment facilities, stormwater and drainage facilities, solid waste disposal, and electricity, natural gas, and telecommunications facilities

4.4.1 Setting

The following section describes the existing setting with respect to wastewater treatment providers, water suppliers, stormwater drainage facilities, solid waste facilities, electricity and natural gas providers, and telecommunications facilities serving the project alignment.

Water

The City of Ukiah's Department of Public Works provides water (primarily sourced from wells) to much of the city. The City of Ukiah draws its water from the Russian River and four active groundwater wells that draw water from the Ukiah Valley Groundwater Basin (City of Ukiah 2020a, City of Ukiah 2020b). Groundwater wells account for approximately 55 percent of the City's potable water.

According to annual water quality testing report, the City of Ukiah's water quality is safe and reliable (City of Ukiah 2020a). The City's water service area comprises nearly 100 percent of the population residing within the city limits, with a small amount (less than 1 percent) of City residents being served by other water providers (City of Ukiah 2020b).

Millview County Water District provides water to north Ukiah and an unincorporated area bordering the city to the north. Willow County Water District provides water to south Ukiah and an unincorporated area bordering the city to the south. All three agencies are expected to adequately meet existing and future demands for water, including in the event of a dry year or multiple dry years (City of Ukiah 2020b).

In addition to community water systems, parcels and residents within unincorporated areas of the City's Sphere of Influence (SOI) rely on private domestic wells for potable water supply. Private wells are common in rural and low-density areas outside city limits and are regulated by Mendocino County in accordance with County General Plan policies and environmental health requirements (County of Mendocino 2026). These private water systems operate independently of the City's municipal water system.

Wastewater

Ukiah's Department of Public Works provides wastewater collection and treatment for approximately two-thirds of the city and operates its own wastewater treatment plant (WWTP). A separate agency, the Ukiah Valley Sanitation District (UVSD) serves the remaining portions of Ukiah, as well as communities in the existing SOI. Operated by the City, one WWTP serves both the city and UVSD. The City's 2020 UWMP identifies that the WWTP has a dry-weather capacity of 3.01 million gallons per day (mgd) and that in 2020, the WWTP collected a total of 2,671 acre-feet per year (AFY), which is equivalent to 2.4 mgd. In unincorporated areas within the SOI, wastewater service conditions differ from those within city limits. Many residents and properties in the SOI are not connected to centralized wastewater collection systems and instead rely on individual private wastewater disposal systems, such as septic systems, consistent with Mendocino County standards for rural and low-density development (City of Ukiah 2020a). These private systems are regulated by the County Environmental Health Division and operate independently of the City's WWTP.



Stormwater Drainage

Stormwater discharges consist of surface water runoff generated from various land uses. The quality of these discharges varies and is affected by geology, land use, season, hydrology, and sequence and duration of hydrologic events. The Ukiah Department of Public Works manages the storm drainage system within the city. According to the 2022 Municipal Services Review, the capacity of the stormwater drainage system is unknown (Ukiah 2022a). Much of the city's stormwater is conveyed by surface flow along curbs and gutters. There are intermittent storm drains throughout the city; however, there is no central trunk line for all the storm drains to collect and convey stormwater to the Russian River. Within the City's SOI, stormwater drainage infrastructure is generally limited and varies by location. Unincorporated areas within the SOI are primarily served by roadside ditches, culverts, swales, and natural drainage features maintained by Mendocino County or, where applicable, Caltrans along state highways. These areas generally lack centralized or interconnected storm drain systems and rely on surface conveyance and natural infiltration consistent with rural and low-density development patterns.

Electricity and Natural Gas

Ukiah has its own Electric Utility Department that provides service to residents in the city. The City's Electric Utility Department is a municipally owned utility that maintains its own power-generating capabilities, such as the 3.5 Megawatt Lake Mendocino Hydroelectric Plant, which is one of the city's major sources of electricity (Ukiah 2022b).

The city is within Pacific Gas & Electric's (PG&E) natural gas service area (City of Ukiah 2020a). Nearly 45 percent of the natural gas burned in California was used for electricity generation, and much of the remainder consumed in the residential (21 percent), industrial (25 percent), and commercial (9 percent) sectors (California Energy Commission [CEC] 2026). Mendocino County consumed approximately 9.321 million US therms (the smallest scale at which natural gas consumption data is readily available) in 2024 (CEC2024).

Telecommunications

In California, approximately 98 percent of households have access to telecommunication infrastructure, including telephone and cable access (California Cable & Telecommunications Association 2026). Broadband and cellular services are provided to residents and businesses from a variety of private companies, including national retailers Comcast, AT&T, Verizon, and Sprint.

Solid Waste and Recycling

Ukiah contracts its solid waste, recycling, and composting to the private company C&S Waste Solutions. Solid waste is transported to the Ukiah Valley Transfer Station, located at 3151 Taylor Drive in Ukiah. Unincorporated areas are served by Waste Management. According to California Department of Resources Recycling and Recovery (CalRecycle) the maximum permitted capacity for the Ukiah Transfer Station is 400 tons per day (CalRecycle 2026a). CalRecycle does not report an estimated capacity closing date for the facility.

4.4.2 Regulatory Setting

a. Federal Regulations

Clean Water Act

The federal Clean Water Act, enacted by Congress in 1972 and amended several times since, is the primary federal law regulating water quality in the United States and forms the basis for several State and local laws throughout the country. The Act established the basic structure for regulating discharges of pollutants into the waters of the United States. The Clean Water Act gave the U.S. Environmental



Protection Agency (USEPA) the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the Clean Water Act is administered by the USEPA and U.S. Army Corps of Engineers. At the State and regional levels in California, the act is administered and enforced by the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCB).

Section 402 of the Clean Water Act requires that municipal, industrial and commercial facilities discharging wastewater or stormwater directly from a point source, such as a pipe, ditch, or channel, into a surface water of the United States must obtain permission under the National Pollutant Discharge Elimination System (NPDES) permit. All NPDES permits are written to ensure that the surface water receiving discharges will achieve specified water quality standards.

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) regulates public water systems that supply drinking water. The principal objective of the federal SDWA is to ensure that water from the tap is potable (safe and satisfactory for drinking, cooking, and hygiene). The main components of the federal SDWA are to:

1. Ensure that water from the tap is potable.
2. Prevent contamination of groundwater aquifers that are the main source of drinking water for a community.
3. Regulate the discharge of wastes into underground injection wells pursuant to the Underground Injection Control program (see 40 Code of Federal Regulations Section 144).
4. Regulate distribution systems.

Title 40 of the Code of Federal Regulations

Title 40 of the Code of Federal Regulations, Part 258 (Resource Conservation and Recovery Act Subtitle D) contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria. The federal regulations address the location, operation, design, groundwater monitoring, and closure of landfills.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 set energy efficiency standards for lighting (specifically light bulbs) and appliances.

Energy Star Program

Energy Star is a voluntary labeling program introduced by the USEPA to identify and promote energy-efficient products to reduce greenhouse gas emissions. The program applies to major household appliances, lighting, computers, and building components such as windows, doors, roofs, and heating and cooling systems. Under this program, appliances that meet specifications for maximum energy use established under the program are certified to display the Energy Star label. In 1996, the USEPA joined with the Energy Department to expand the program, which now also includes certifying commercial and industrial buildings as well as homes (USEPA 2026).

Telecommunications Act

In 1996, the Federal Communications Commission (FCC) passed the Telecommunications Act, allowing any communications business to compete in any market against any other business. This act affects



telephone service, cable programming, and other video services, including broadcast services and services provided to schools (FCC 2026).

b. State Regulations

Water and Wastewater

Sustainable Groundwater Management Act

In September 2014, the governor signed legislation requiring that California’s critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater Management Act gives local agencies the power to sustainably manage groundwater and requires groundwater sustainability plans to be developed for medium- and high-priority groundwater basins, as defined by the California Department of Water Resources.

California Department of Water Resources

The California Department of Water Resources is responsible for preparing and updating the California Water Plan, which is a policy document that guides the development and management of State water resources. The plan is updated every five years to reflect changes in resources and urban, agricultural, and environmental water demands. The California Water Plan suggests ways of managing demand and augmenting supply to balance water supply with demand.

Urban Water Management Planning Act

In 1983 the California Legislature enacted the Urban Water Management Planning Act (Water Code Section 10610–10656). The Act states that every urban water supplier that provides water to 3,000 or more customers, or that provides over 3,000 acre-feet annually, should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years. The Act requires that urban water suppliers adopt an UWMP at least once every five years and submit them to the California Department of Water Resources. Noncompliant urban water suppliers are ineligible to receive funding pursuant to Division 24, commencing with Section 78500, or Division 26, commencing with Section 79000, or receive drought assistance from the State until the UWMP is submitted and deemed complete pursuant to the Urban Water Management Planning Act.

Porter-Cologne Water Quality Control Act (California Water Code)

The State of California is authorized to administer Federal or State laws regulating water pollution within the State. The Porter-Cologne Water Quality Control Act (Water Code Section 13000, *et seq.*) includes provisions to address requirements of the Clean Water Act. These provisions include NPDES permitting, dredge and fill programs, and civil and administrative penalties. The Porter-Cologne Act is broad in scope and addresses issues relating to the conservation, control, and utilization of the water resources of the State. Additionally, the Porter-Cologne Act states that the quality of all the waters of the State, including groundwater and surface water, must be protected for the use and enjoyment by the people of the State.

In California, the NPDES program is administered by the SWRCB through the RWQCB and requires municipalities to obtain permits that outline programs and activities to control wastewater and stormwater pollution. The federal Clean Water Act prohibits discharges of stormwater from construction projects unless the discharge is in compliance with an NPDES permit. The SWRCB is the permitting authority in California, and adopted an NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, otherwise known as the Construction General Permit (Order 2009-0009, as amended by Orders 2010-0014-DWQ and 2012-006-DWQ). The Order applies to construction sites that include one or more acres of soil disturbance. Construction activities include clearing, grading, grubbing, excavation, stockpiling, and reconstruction of existing facilities involving



removal or replacement. The Construction General Permit requires that the landowner and/or contractor file permit registration documents prior to commencing construction and then pay a fee annually through the duration of construction. These documents include a notice of intent, risk assessment, site map, stormwater pollution prevention plan (SWPPP), and signed certification statement. The SWPPP must include measures to ensure that: all pollutants and their sources are controlled; non-stormwater discharges are identified and eliminated, controlled, or treated; site Best Management Practices (BMP) are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges; and BMPs installed to reduce or eliminate pollutants after construction are completed and maintained. The Construction General Permit specifies minimum BMP requirements for stormwater control based on the risk level of the site. The Permit also specifies minimum qualifications for a qualified SWPPP developer and qualified SWPPP practitioner.

Title 22 of California Code of Regulations

Title 22 regulates the use of reclaimed wastewater. In most cases only disinfected tertiary water may be used on food crops where the recycled water would come into contact with the edible portion of the crop. Disinfected secondary treatment may be used for food crops where the edible portion is produced below ground and will not come into contact with the secondary effluent. Lesser levels of treatment are required for other types of crops, such as orchards, vineyards, and fiber crops.

The California Department of Public Health sets specific requirements for treated effluent reuse, or recycled water, through Title 22 of the California Code of Regulations. These requirements are primarily set to protect public health. The California Code of Regulations Title 22, Division 4, Chapter 3, Sections 60301 through 60355 are used to regulate recycled wastewater and are administered jointly by the California Department of Public Health and the RWQCBs. Title 22 contains effluent requirements for four levels of wastewater treatment, from un-disinfected secondary recycled water to disinfected tertiary recycled water. Higher levels of treatment have higher effluent standards, allowing for a greater number of uses under Title 22, including irrigation of freeway landscaping, pasture for milk animals, parks and playgrounds, and vineyards and orchards for disinfected tertiary recycled water.

Electricity and Natural Gas

California Energy Commission

As the State's primary energy policy and planning agency, the CEC collaborates with State and federal agencies, utilities, and other stakeholders to develop and implement State energy policies. Since 1975, the CEC has been responsible for reducing the State's electricity and natural gas demand, primarily by adopting new Building and Appliance Energy Efficiency Standards that have contributed to keeping California's per capita electricity consumption relatively low. The CEC is also responsible for the certification and compliance of thermal power plants 50 megawatts and larger, including all project-related facilities in California.

California Public Utilities Commission

The CPUC regulates investor-owned electric and natural gas utilities operating in California. The energy work responsibilities of the CPUC are derived from the California State Constitution, specifically Article XII, Section 3 and other sections more generally, numerous State legislative enactments and various Federal statutory and administrative requirements. The CPUC regulates natural gas utility service for approximately 10.8 million customers that receive natural gas from PG&E and other natural gas utilities across California (CPUC 2026).



Senate Bill 350

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires a doubling of the energy efficiency savings in electricity and natural gas for retail customers through energy efficiency and conservation by December 31, 2030.

Solid Waste

California Department of Resources Recycling and Recovery

The California Department of Resources Recycling and Recovery (CalRecycle) oversees, manages, and monitors waste generated in California. CalRecycle provides limited grants and loans to help California cities, counties, businesses, and organizations meet the State waste reduction, reuse, and recycling goals. It also provides funds to clean up solid waste disposal sites and co-disposal sites, including facilities that accept hazardous waste substances and non-hazardous waste. CalRecycle develops, manages, and enforces waste disposal and recycling regulations, including Assembly Bill (AB) 939 and SB 1016, both of which are described below.

Assembly Bill 939

AB 939 (Public Resources Code 41780) requires cities and counties to prepare integrated waste management plans and to divert 50 percent of solid waste from landfills beginning in calendar year 2000 and each year thereafter. AB 939 also requires cities and counties to prepare Source Reduction and Recycling Elements as part of the integrated waste management plans. These elements are designed to develop recycling services to achieve diversion goals, stimulate local recycling in manufacturing and stimulate the purchase of recycled products.

Senate Bill 1016

SB 1016 requires that the 50 percent solid waste diversion requirement established by AB 939 be expressed in pounds per person per day. SB 1016 changed the CalRecycle review process for each municipality's integrated waste management plan. After an initial determination of diversion requirements in 2006 and establishing diversion rates for subsequent calendar years, the Board reviews a jurisdiction's diversion rate compliance in accordance with a specified schedule. The Board is required to review a jurisdiction's source reduction and recycling element and hazardous waste element once every two years.

Assembly Bill 341 – Mandatory Commercial Recycling

The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste to recycling efforts and to expand the opportunity for additional recycling services and recycling manufacturing facilities in California. AB 341 required all businesses that generate four or more cubic yards of garbage per week and multi-family dwellings with five or more units to recycle by July 1, 2012. AB 341 also sets a statewide goal of 75 percent waste diversion.

c. Local Regulations

Municipal Stormwater Permitting Program

RWQCBs issue stormwater discharge permits. The Phase I Municipal Separate Storm Sewer System (MS4) (Order R1-2015-0030) is applicable to the City of Ukiah in the North Coast Region RWQCB (RWQCB 2026). The MS4 programs implement and enforce BMPs to reduce the discharge of pollutants from municipal separate storm sewer systems. The MS4 requires the City to establish monitoring programs for outfalls, receiving water, and chronic toxicity.



Ukiah Valley Basin Groundwater Sustainability Agency

In 2017, the City came together with the County of Mendocino and other Ukiah Valley agencies to form the Ukiah Valley Basin Groundwater Sustainability Agency (UVBGSA). The UVBGSA was created by a Joint Powers Agreement to serve as the official Groundwater Sustainability Agency for the Ukiah Valley Basin required by the Sustainable Groundwater Management (SGMA) Act of 2014.

City of Ukiah 2040 General Plan

The City of Ukiah 2040 General Plan provides the policy framework governing the provision and long-term planning of municipal utilities and public services within the city limits. The Public Facilities, Services, and Infrastructure Element addresses water supply, wastewater collection and treatment, stormwater management, solid waste services, energy, and municipal facilities. This Element establishes policies to ensure that public services and utilities are provided efficiently, maintain adequate service levels, and are aligned with land use planning and growth management objectives.

Mendocino County General Plan

The Mendocino County General Plan governs utilities and public services within unincorporated areas of the County. County policies address water supply, wastewater systems, stormwater management, solid waste disposal, and other public services, with an emphasis on ensuring adequate capacity, protecting public health, and coordinating service provision with land use designations.

County General Plan policies support orderly transitions of service responsibility where annexation or reorganization occurs and encourage coordination between the County, cities, and special districts to ensure efficient and cost-effective delivery of utilities. Utility services within unincorporated areas are implemented through County departments and special districts, subject to applicable regulatory requirements and service standards.

Ukiah Valley Area Plan

The Ukiah Valley Area Plan (UVAP), together with the Mendocino County General Plan, includes goals and policies related to utilities and service systems. The following goals and policies emphasize orderly growth, infrastructure efficiency, and the coordination of public services with land use planning to avoid premature or unnecessary expansion of facilities:

- **WM1:** Promote efforts that protect and increase water supply storage and capacity
 - WM1.1: Maintain and increase water supplies and systems for existing and future water system needs.
 - WM1.1a Identify Water Sources Cooperate and coordinate with the City of Ukiah, LAFCO, the Water Agency, and local water districts in the provision of infrastructure and services within the Ukiah Valley.
 - WM1.1c Water Rights Expansion Identify Russian River system water rights that may be available to support development of new land uses in the Valley

4.4.3 Impact Analysis

a. Significance Thresholds

In accordance with Appendix G of the CEQA Guidelines, a significant utilities impact would occur if new development facilitated by the proposed project would:

1. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;



2. Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;
3. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
4. Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or
5. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

b. Methodology

This analysis considers the existing capacity of utilities serving the city, estimates qualitatively and quantitatively the potential additional demand on utilities, and identifies whether the existing system can serve the demand of the existing demand plus the project's estimated demand.

Prior Environmental Analysis

Utilities and service systems within the proposed project area have been evaluated in multiple previously certified environmental documents, including the Ukiah 2040 General Plan EIR, the Mendocino County General Plan Update EIR, and the UVAP EIR. These documents provide program-level analyses of water supply, wastewater treatment and collection, stormwater drainage, solid waste management, and energy and telecommunications infrastructure within the City of Ukiah, the City's Sphere of Influence, and surrounding unincorporated areas of Mendocino County. Collectively, these documents establish the environmental baseline and growth assumptions applicable to the proposed reorganization project.

Ukiah 2040 General Plan EIR

Utilities and service systems are analyzed in Chapter 4.13 (Utilities and Service Systems) of the Ukiah 2040 General Plan EIR. The General Plan EIR evaluated impacts related to water supply adequacy, wastewater treatment capacity, stormwater drainage facilities, solid waste generation and disposal, and the provision of electricity, natural gas, and telecommunications services. The EIR concluded that implementation of the General Plan would result in less-than-significant impacts related to utilities and service systems, provided that development complies with adopted General Plan policies, infrastructure planning requirements, and applicable state and local regulations.

The Ukiah 2040 General Plan EIR determined that projected growth under the General Plan would be accommodated by planned water supply sources and wastewater treatment capacity, and that no new or expanded utilities infrastructure would be required beyond what is contemplated in adopted plans and capital improvement programs. No mitigation measures were required for utilities and service systems, as impacts were determined to be less than significant.

Mendocino County General Plan Update EIR

Utilities and service systems are addressed in Chapter 4.14 (Utilities and Service Systems) of the Mendocino County General Plan Update EIR. The County EIR evaluated potential impacts associated with water supply, wastewater disposal, solid waste facilities, and dry utilities resulting from development permitted under the County General Plan. The analysis concluded that impacts related to wastewater disposal, solid waste, and dry utilities would be less than significant with implementation of adopted County policies.

The County General Plan Update EIR identified potentially significant and unavoidable impacts related to long-term water supply availability at a countywide, programmatic level, based on projected growth and cumulative demand. These conclusions were based on conservative assumptions regarding buildout across Mendocino County and included areas outside the City of Ukiah and its Sphere of Influence. The



County EIR did not identify mitigation measures beyond compliance with adopted policies, water conservation measures, and coordination with water service providers.

Ukiah Valley Area EIR

Utilities and service systems are discussed in Chapter 3.10 (Public Services and Infrastructure) of the Ukiah Valley Area Plan EIR. The UVAP EIR analyzed the potential for growth envisioned under the UVAP to affect water supply, wastewater treatment capacity, and other utility services within the Ukiah Valley. The UVAP EIR concluded that buildout of the UVAP could result in significant and unavoidable impacts related to water supply and wastewater treatment capacity, based on growth-inducing land use changes and assumptions that exceed existing service constraints.

The UVAP EIR included mitigation measures aimed at coordinating infrastructure planning, promoting conservation, and managing growth; however, due to the scale of potential development anticipated under the plan, certain utility impacts were determined to remain significant and unavoidable at the programmatic level.

c. Project Impacts and Mitigation Measures

Threshold 1: Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Impact UTIL-1 The proposed project would not increase demand for water, wastewater, electric power, natural gas, telecommunications, or stormwater drainage facilities. The proposed project is administrative in nature and would not facilitate or authorize development or infrastructure expansion. Therefore, no impact would occur.

The proposed project would not require or result in the construction or relocation of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities.

The proposed project consists of the reorganization of jurisdictional boundaries and municipal service territories within the City's existing Sphere of Influence and the pre-zoning of annexed unincorporated areas to reflect existing County standards. The proposed project would not authorize new residential or non-residential development, would not increase development intensity, and would not establish a growth or buildout program. As a result, the proposed project would not create additional demand for utilities beyond existing conditions.

No development is proposed or would be facilitated by the proposed project. As such, expansion of water supply infrastructure, wastewater treatment capacity, stormwater drainage systems, or energy and telecommunications facilities would not be required. Existing water, wastewater, and stormwater systems would continue operating under current service conditions, with service provision adjusted administratively where annexation occurs. Any future connections to utility systems would be limited to development already permitted under existing County or City entitlements and would remain subject to separate discretionary review and project-level CEQA analysis.

The Pinoleville Rancheria area would not be included in the proposed reorganization areas; however, the City would coordinate with the Pinoleville Rancheria regarding the continued provision of City services in order to maintain existing levels of service currently being provided. This coordination would be administrative in nature and would not involve construction or expansion of utility infrastructure beyond existing conditions.

Similarly, implementation of the proposed project would not require construction of new electric power, natural gas, or telecommunications infrastructure. Utility providers would continue to operate existing



facilities, and no new trunk lines, substations, pipelines, or communication facilities would be proposed as part of the proposed project. Any future utility upgrades unrelated to the proposed project would be implemented independently and would undergo individual environmental review as required.

With respect to stormwater drainage, the proposed project would not alter drainage patterns or require construction or expansion of stormwater facilities. Because no grading, construction, or land disturbance is proposed as part of the proposed project, there would be no change in runoff characteristics attributable to project implementation. Existing stormwater regulations would continue to apply to future development proposals.

The City of Ukiah General Plan includes policies in the Public Facilities, Services, and Infrastructure Element that guide utility planning toward efficiency, resilience, and sustainability, including improving infrastructure performance, promoting energy conservation, encouraging undergrounding of utilities where feasible, and requiring low-impact development practices for stormwater management. The following applicable policies provide guidance for utility planning and service provision within the city:

Goal PFS-1. To maintain a safe and adequate water system to meet the needs of existing and future development.

Policy PFS-1.1: Water Service Annexation Impacts. The City shall ensure newly annexed areas within the city do not negatively affect water services to existing customers

Policy PFS-1.3: Consolidation of Water Districts. The City shall support the consolidation of water districts as part of future annexations to establish efficient services and ensure adequate water supply and delivery.

Policy PFS-1.4: Water Storage. The City shall encourage the protection and expansion of existing sources and methods of water storage for future development.

Policy PFS-2.4: Ukiah Valley Sanitation District. The City should collaborate with Ukiah Valley Sanitation District to ensure adequate wastewater collection and treatment is provided to properties within City limits and their jurisdictional boundaries.

Policy PFS-2.5: Out of Area Service Agreements. The City shall require out of service area agreements in rural areas where the Ukiah Valley Sanitation District cannot feasibly provide wastewater services.

While these policies would apply to future development projects, they are not triggered by, nor would they be implemented as part of, the proposed project.

The proposed project is administrative in nature and does not include or facilitate physical development, it would not require the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Therefore, there would be no impacts related to utilities and service systems. The project would not result in new or substantially more severe significant impacts to utilities and service systems beyond those addressed or analyzed in the Ukiah 2040 General Plan EIR, Mendocino County General Plan Update EIR, and UVAP EIR, nor present new information that shows impacts would be more significant than those described in the prior certified EIRs. Pursuant to CEQA Guidelines Sections 15162(a)(3) and 15163(a), no additional mitigation measures or further environmental analysis would be required.

Mitigation Measures

No mitigation measures would be required.



Threshold 2: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Impact UTIL-2 The proposed project would not increase water demand because it would not facilitate or authorize development. Water demand would remain consistent with existing conditions, and no expansion of water supply infrastructure would be required. Therefore, no impact would occur

The proposed project would not facilitate future growth or development and therefore would not create additional demand for potable water supplies within the City of Ukiah or the annexed areas. The proposed project is administrative in nature and is limited to the reorganization of jurisdictional boundaries and municipal service territories within the City's existing Sphere of Influence, along with the pre-zoning of annexed unincorporated lands to maintain existing County land use designations and zoning standards.

The proposed project would not authorize residential or non-residential development, would not increase development intensity, and would not establish a growth or buildout scenario. As such, no new water demand was calculated using water demand factors or modeling tools, and no assumptions regarding future growth were made for the purposes of this analysis. Water demand within the city and annexed areas would continue to be governed by the growth assumptions and buildout scenarios established in the City of Ukiah General Plan, the Mendocino County General Plan, and the UVAP EIR. Under the proposed project, water demand would remain consistent with existing conditions. Any demand would be limited to development already permitted under existing City or County land use entitlements. Further, as discussed in the City of Ukiah General Plan EIR, growth under the City of Ukiah General Plan accounted for potential growth and expansion of the SOI. As determined in the City of Ukiah General Plan EIR, water supply would be sufficient to accommodate estimated growth in the city and the SOI. The proposed project would not introduce new growth beyond that evaluated in the City of Ukiah General Plan EIR and the UVAP EIR. The proposed project would operate within these adopted planning frameworks and would not modify, expand, or accelerate growth beyond what has already been contemplated and evaluated in those documents.

Although annexation would result in a change in service provider for certain areas, the reorganization would not require expansion of water supply sources, construction of new water treatment facilities, or increased water deliveries. Existing water systems would continue to operate within their current capacity, and service realignment would occur administratively. Any future development proposals within annexed areas would be subject to separate discretionary review and project-level CEQA analysis to evaluate water supply availability and infrastructure capacity at that time.

The City of Ukiah General Plan includes policies that guide long-term water system planning, conservation, and service efficiency to ensure reliable water supplies for existing customers and any future development that may occur independently of the proposed project. As described in Impact UTIL-1 policies would continue to apply following annexation but are not activated by the proposed reorganization itself. In addition, the Pinoleville Rancheria area would not be included in the proposed reorganization areas; however, the City would coordinate with the Pinoleville Rancheria regarding the continued provision of City water services in order to maintain existing levels of service currently being provided. This coordination would be administrative in nature and would not require expansion of water supply infrastructure or result in increased water demand.

Because the proposed project would not increase water demand, modify land use patterns, or induce growth, it would not adversely affect the City's water supply or distribution system. Accordingly, the proposed project would not result in impacts to the City's water supply or distribution system. The project would not result in new or substantially more severe significant impacts to water supply beyond those addressed or analyzed in the Ukiah 2040 General Plan EIR, Mendocino County General Plan Update EIR, and UVAP EIR, nor present new information that shows impacts would be more significant than those described in the prior certified EIRs. Pursuant to CEQA Guidelines Sections 15162(a)(3) and 15163(a), no additional mitigation measures or further environmental analysis would be required.



Mitigation Measures

No mitigation measures would be required.

Threshold 3: Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Impact UTIL-3 The proposed project would not increase demand for wastewater treatment or require expansion of wastewater facilities. The project is administrative in nature and would not authorize development. Therefore, no impact would occur.

The proposed project would not result in increased wastewater generation or additional demand on wastewater collection, treatment, or disposal facilities. The proposed project would not facilitate new residential or non-residential development, would not increase development intensity, and would not establish a growth or buildout scenario. As a result, no wastewater generation calculations based on projected water demand or land use assumptions were required for this analysis, as the proposed project does not introduce new growth forecasts, modify adopted buildout scenarios, or alter the growth assumptions established in the City of Ukiah General Plan, the Mendocino County General Plan, or the Ukiah Valley Area Plan EIR.

Implementation of the proposed project would involve the administrative realignment of wastewater service responsibilities within annexed areas but would not require expansion of wastewater treatment capacity, construction of new wastewater facilities, or modification of existing wastewater infrastructure. As part of the reorganization, the City would annex a portion of the Ukiah Valley Sanitation District, and once statutory thresholds are met, the Sanitation District would be established as a subsidiary district of the City. This action would consolidate governance and service responsibility while continuing wastewater collection and treatment using the existing facilities operated by the City. In areas not served by centralized wastewater systems, including portions of the SOI, properties relying on private wastewater disposal systems (e.g., septic systems) would continue to operate as currently permitted and regulated, with no changes required as a result of the proposed project. Existing wastewater flows would remain consistent with current conditions and permitted land use entitlements. Wastewater service to annexed areas would continue under existing service arrangements, with jurisdictional responsibility adjusted as appropriate.

As the proposed project would not authorize development or increase wastewater flows, the Ukiah Valley Wastewater Treatment Plant would not experience increased loading attributable to the reorganization. Any future development proposals within annexed areas that could generate additional wastewater would be subject to separate discretionary review and project-level CEQA analysis to evaluate wastewater generation, collection system capacity, and treatment plant capacity at the time such development is proposed.

The City of Ukiah Public Facilities, Services, and Infrastructure Element of the General Plan includes policies that guide long-term wastewater planning and coordination to ensure continued service reliability and regulatory compliance. Relevant policies include the following:

Goal PFS-2. To maintain quality wastewater treatment and disposal services to meet the needs of existing and future development.

Policy PFS-2.1: Level of Service. The City shall maintain an adequate level of service in the City's wastewater collection, treatment, and disposal system to meet the needs of existing and projected development and all State and Federal regulations.

Policy PFS-2.3: Wastewater Service Coordination. The City shall coordinate with the Ukiah Valley Sanitation District to ensure ongoing wastewater treatment capacity within the wastewater treatment plant for future development.



Policy PFS-2.4: Ukiah Valley Sanitation District. The City should collaborate with Ukiah Valley Sanitation District to ensure adequate wastewater collection and treatment is provided to properties within City limits and their jurisdictional boundaries.

Policy PFS-2.5: Out of Area Service Agreements. The City shall require out of service area agreements in rural areas where the Ukiah Valley Sanitation District cannot feasibly provide wastewater services.
PFS-2.6 Wastewater Service Capacity. The City shall ensure there is adequate wastewater service capacity prior to annexation of additional land.

These policies address maintaining adequate levels of service, ensuring sufficient funding for wastewater infrastructure, coordinating with the Ukiah Valley Sanitation District regarding treatment capacity, and verifying service availability prior to annexation or approval of development. While these policies establish a framework for future infrastructure planning, they are not triggered by the proposed reorganization project, as no new demand would be created.

The proposed project would not increase wastewater generation, require expansion of wastewater treatment facilities, or induce development, therefore it would not result in adverse environmental impacts related to wastewater treatment or disposal. Accordingly, there would be no impact to wastewater facilities. The project would not result in new or substantially more severe significant impacts to wastewater facilities beyond those addressed or analyzed in the Ukiah 2040 General Plan EIR, Mendocino County General Plan Update EIR, and UVAP EIR, nor present new information that shows impacts would be more significant than those described in the prior certified EIRs. Pursuant to CEQA Guidelines Sections 15162(a)(3) and 15163(a), no additional mitigation measures or further environmental analysis would be required.

Mitigation Measures

No mitigation measures would be required.

Threshold 4: Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Threshold 5: Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact UTIL-4 The proposed project would not increase the volume of solid waste generated in Ukiah or annexed areas because it would not facilitate or authorize development. The proposed project is administrative in nature and would not result in the generation of construction or operational waste. Therefore, no impact would occur.

The proposed project would not result in increased solid waste generation and would not require expanded solid waste disposal capacity. The proposed project would not authorize residential, commercial, industrial, or infrastructure development and would not include construction activities. As such, no construction-related debris, operational municipal solid waste, or industrial waste would be generated as a result of implementation of the proposed project.

Because the proposed project would be limited to the reorganization of jurisdictional boundaries and municipal service responsibilities related to water and wastewater only, solid waste generation levels within the City of Ukiah and annexed areas would remain consistent with existing conditions and with levels already permitted under existing land use entitlements. C&S Waste Solutions through two franchise waste haulers, Ukiah Waste Solutions and Redwood Waste Solutions, provides solid waste collection and recycling to the city of Ukiah and its SOI. These services would continue to be provided by existing providers under current service arrangements for five years after annexation under the existing franchise agreement. After five years, the franchise waste hauler for the annexation area may be adjusted from Redwood Waste Solutions to Ukiah Waste Solutions.



The Ukiah Transfer Station currently operates below its permitted daily capacity, and existing solid waste management facilities have sufficient capacity to accommodate solid waste generated under existing conditions. Because the proposed project would not increase population, change land use intensity, or facilitate new development, it would not increase the amount of waste requiring disposal at local or regional facilities.

Any future development proposals within annexed areas that could generate additional solid waste would occur independently of the proposed project and would be subject to separate discretionary review and project-level CEQA analysis. Such analysis would evaluate solid waste generation and disposal capacity at the time development is proposed and would ensure compliance with applicable federal, state, and local solid waste management regulations.

The City of Ukiah Public Facilities, Services, and Infrastructure Element of the General Plan includes policies that promote waste reduction, recycling, composting, and diversion of solid waste through compliance with CALGreen requirements and other waste-management practices.

Goal PFS-3. To ensure adequate solid waste, recycling, and composting services and maximize waste diversion from landfills.

Policy PFS-3.2: Waste Management Services. The City shall continue waste management service contracts to provide quality and cost-effective solid waste removal throughout the city and require all residents and businesses to comply with solid waste collection and recycling service requirements.

These policies provide a framework for future development but are not triggered by the proposed project, as no development is proposed.

Because the proposed project would not generate solid waste or increase demand on disposal facilities, it would not result in impacts related to solid waste generation and disposal. The project would not result in new or substantially more severe significant impacts to solid waste beyond those addressed or analyzed in the Ukiah 2040 General Plan EIR, Mendocino County General Plan Update EIR, and UVAP EIR, nor present new information that shows impacts would be more significant than those described in the prior certified EIRs. Pursuant to CEQA Guidelines Sections 15162(a)(3) and 15163(a), no additional mitigation measures or further environmental analysis would be required.

Mitigation Measures

No mitigation measures would be required.

4.4.4 Cumulative Impacts

The geographic scope for cumulative analysis of utilities and service systems varies by utility type and is generally defined by the service area of the applicable utility provider and associated infrastructure. The cumulative analysis considers past, present, and reasonably foreseeable actions within the City of Ukiah and surrounding unincorporated areas of Mendocino County, in combination with implementation of the proposed project. Because the proposed project is administrative in nature and would not authorize development, the cumulative analysis focuses on whether reorganization, when considered alongside other actions, would result in cumulatively considerable impacts to utilities or service systems.

Water

The geographic scope for cumulative water impacts includes the City of Ukiah water service area and adjacent unincorporated areas currently served by local water districts. This scope is appropriate because water supply, treatment, and distribution are managed at the local level and cumulative demands are evaluated within existing service boundaries.

The proposed project would not increase water demand, as it would not authorize new development or intensification of land uses. Existing water supply, treatment, and distribution systems would continue to operate under current conditions following reorganization, with responsibility for service provision



transitioning administratively to the applicable City water agency or subsidiary district where annexation occurs. Existing and reasonably foreseeable projects in the cumulative study area are subject to separate discretionary review to ensure that adequate water supplies are available prior to approval. Because the proposed project would not add demand and existing regulatory processes ensure water availability for other cumulative projects, there would be no cumulative impacts to water supply, and the proposed project's contribution would not be cumulatively considerable.

Wastewater

The geographic scope for cumulative wastewater impacts encompasses areas served by the Ukiah Valley wastewater collection and treatment system. This scope is appropriate because wastewater flows from multiple jurisdictions are conveyed to shared treatment facilities.

The proposed project would not increase wastewater generation, as it does not facilitate new development. Wastewater collection and treatment operations would continue using existing facilities and capacities, though service responsibility would be adjusted administratively where reorganization or annexation occurs, such as through establishment of a city subsidiary sanitation district. Existing and future projects in the cumulative study area that could generate additional wastewater are required to demonstrate adequate conveyance and treatment capacity and would undergo project-level CEQA review if system expansions or upgrades are needed. Because the proposed project would not add wastewater flows and planning for wastewater capacity is addressed through separate regulatory processes. As such, there would be no cumulative impact related to wastewater facilities, and the proposed project would not contribute cumulatively.

Stormwater

The geographic scope for cumulative stormwater impacts includes the City's stormwater drainage service area and adjacent unincorporated areas subject to County stormwater regulations. This scope captures areas where runoff management and water quality protection are regulated through municipal and regional programs.

The proposed project would not alter drainage patterns or increase impervious surfaces and therefore would not contribute to increased stormwater runoff. Existing stormwater drainage systems and regulatory frameworks would remain in place following reorganization, with operations and maintenance continuing under the appropriate City or County authority as jurisdictional boundaries change. Cumulative projects involving physical development are required to comply with applicable stormwater permitting requirements and low-impact development standards. Because the proposed project would not involve construction or land disturbance and cumulative projects are regulated to address stormwater impacts, there would be no cumulative stormwater impacts, and the proposed project's contribution would not be cumulatively considerable.

Electric Power, Natural Gas, and Telecommunications

The geographic scope for cumulative impacts related to electric power, natural gas, and telecommunications encompasses the service territories of existing utility providers serving the Ukiah area. These services are planned and operated on a service-area basis to ensure reliability and capacity.

The proposed project would not increase energy or telecommunications demand, as it would not authorize development or population growth. Any future infrastructure upgrades required to serve cumulative development would be implemented independently by utility providers and subject to applicable regulatory oversight and environmental review. Because the proposed project would not add demand or require new facilities, there would be no cumulative impacts to electric power, natural gas, and telecommunications systems, and the proposed project would not contribute cumulatively.



Solid Waste

The geographic scope for cumulative solid waste impacts includes areas contributing waste to local solid waste management facilities serving Ukiah and surrounding areas. This scope is appropriate because disposal capacity and diversion programs are addressed regionally.

The proposed project would not generate solid waste, as it would not include construction or operational activities. Other cumulative projects that generate solid waste are subject to state and local waste diversion requirements and are served by facilities with available permitted capacity. Because the proposed project would not increase waste generation and solid waste facilities are planned to accommodate regional needs, there would be no cumulative impacts related to solid waste, and the proposed project's contribution would not be cumulatively considerable.